

**Chart Regarding the Sole New Defendant in the
Proposed Second Amended Complaint of Lead Plaintiff Neville Seymour Davis**

In re Herald, Primeo, and Thema Funds Securities Litigation, No. 09 Civ. 0289 (RMB) (S.D.N.Y.)
(Related to *Davis v. Benbassat*, No. 09 Civ. 2558 (RMB) (S.D.N.Y.))

New Defendant	Reason for Addition	Basis for Personal Jurisdiction	Method of Service
HSBC Bank USA, N.A.	Based on recently-discovered information, HSBC Bank USA, N.A. participated in creating and marketing the structured financial products involving the Thema International Fund and is thus liable for the losses of Lead Plaintiff and the Class.	FED. R. CIV. P. 4(k) N.Y. C.P.L.R. § 301	By hand delivery to HSBC Bank USA, N.A.'s principal executive offices located at 452 Fifth Avenue, New York, New York 10018.